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Attorneys for Debtor

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF ARIZONA

In re

BERTIE SUSAN BRODSKY,

Debtor.

NATIONSTAR MORTGAGE, LLC, its
assignees and/or successors,

Movant,

v.

BERTIE SUSAN BRODSKY aka Berti S.
Brodsky fdba Berti S. Brodsky Insurance
Agency, fdba The Spice of Life Gourmet,
Debtor; Dianne C. Kerns, Chapter 13 Trustee,

Respondents.

In Proceedings Under
Chapter 13

NO. 4:16-bk-00885-BMW

**RESPONSE TO NATIONSTAR
MORTGAGE, LLC'S MOTION FOR
RELIEF FROM AUTOMATIC STAY
AND ABANDONMENT OF ESTATE
PROPERTY**

(7016 A & B Gaston Lane SW
Tumwater, WA 98501)

The Debtor, Bertie Brodsky, in response to the Motion for Relief from Automatic Stay filed by Nationstar Mortgage, LLC, respectfully asserts that Nationstar Mortgage, LLC, has contacted the Debtor directly and has made arrangements for modifications to the mortgages, and the Debtor has commenced making payments under those proposed modifications. Should the

RESP TO NATIONSTAR MFR.doc

1 Debtor make three consecutive payments under the proposed modifications, the modifications will
2 take affect and will go forward, which will be incorporated into the Debtor's Chapter 13 Plan.

3 Accordingly, for the foregoing reasons, the Debtor respectfully requests that the
4 Motion for Relief from Automatic Stay be denied.

5 RESPECTFULLY SUBMITTED this 18th day of January, 2017.

6 LAW OFFICE OF SCOTT D. GIBSON, PLLC

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8 By: /s/ Scott D. Gibson (007395)

9 Scott D. Gibson
10 Attorneys for Debtor

11 CERTIFICATE OF SERVICE

12 Original electronically filed and copies of the foregoing served via the Court's CM/ECF
13 Notification System this 18th day of January, 2017, on all Electronic Case Filing Participants that
14 have appeared in the above-captioned case, or U.S. Mail to parties not registered through
15 CM/ECF.

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25 Chapter 13 Trustee

26 By: /s/ Maria Calderon